

## REMARKS

This is intended as a full and complete response to the Final Office Action dated December 12, 2008, having a shortened statutory period for response set to expire on March 12, 2009. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 10, 13, 14, 22, and 28 are pending in the application. Claims 10, 13, 14, 22, and 28 remain pending following entry of this response.

### Claim Rejections - 35 U.S.C. § 103

Claims 10, 13, 14, 22, and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Chatterjee, et al.* (U.S. Patent No. 7,162,691), in view of *Dobrowski, et al.* (U.S. Patent No. 7,152,072). Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a prima facie case of obviousness. See MPEP § 2141. Establishing a prima facie case of obviousness begins with first resolving the factual inquiries of *Graham v. John Deere Co.* 383 U.S. 1 (1966). The factual inquiries are as follows:

- A. determining the scope and content of the prior art;
- B. ascertaining the differences between the claimed invention and the prior art;
- C. resolving the level of ordinary skill in the art; and
- D. considering any objective indicia of nonobviousness.

Once the *Graham* factual inquiries are resolved, the Examiner must determine whether the claimed invention would have been obvious to one of ordinary skill in the art.

Respectfully, Applicants submit that the Examiner has not properly characterized the teachings of the references and/or the claims at issue. Accordingly, a *prima facie* case of obviousness has not been established.

In this case, the Examiner continues to suggest that the combination of

- a reference disclosing a technique allowing metadata describing multimedia content in a web-page to be used to enhance text-based search results of the web-page (*Chatterjee*) and
- a reference disclosing techniques for managing industrial process data related to chemical and petroleum plants (*Dobrowski*)

renders the present claims obvious. Respectfully, Applicants disagree. In particular, Applicants submit that the combination of *Chatterjee* and *Dobrowski* does not render obvious the method recited by claim 10 for “managing annotations for a plurality of different type data objects” that includes “selecting, based on the set of identifying parameters, a mapping from a plurality of mappings, each containing a different set of mapping functions” and also includes “creating an index for the annotated data object by mapping the identifying parameters to columns in an index table, as specified by the mapping functions of the selected mapping, wherein the mapping functions for each mapping are designed to map a different set of identifying parameters to columns in the index table, wherein the mapping functions of at least one of the mappings maps more than one identifying parameter to a single column.” Independent claim 28 recites similar limitations.

The Examiner suggests:

[*Chatterjee* discloses] creating an index for the annotated data object by mapping the identifying parameters to columns in an index table, as specified by the mapping functions of the selected mapping, (*Chatterjee et al.*, column 1, lines 38-40; column 6, lines 44-51 ).

Final Office Action, p. 5. However, the passages cited by the Examiner do not disclose an index being created for the annotated “creating an index for the annotated data object by mapping the identifying parameters to columns in an index table” whether “as specified by the mapping functions of the selected mapping” or not. Instead, the passages describe that metadata generated to describe a multimedia object in a web page may be embedded in that webpage. While the text terms of the metadata may ultimately be parsed and indexed (e.g., to allow a person to specify a text-based search term and have the page included in search results if the search term appears in the metadata), nothing in this process of embedding metadata in web pages discloses “mapping the identifying parameters to columns in an index table,” as claimed. Instead,

the metadata describing multimedia is embedded back in the web page itself. For example, the first passage describes

The present invention takes the form of methods and apparatus for first analyzing each Web page to be indexed to identify media data which are incorporated by reference into that Web page; then extracting information describing the media data thus identified from the referencing Web page, from the media file itself, and from other sources; then inserting the extracted information as text annotations into a copy of the original Web page used for indexing purposes, and finally presenting the annotated Web page for processing by conventional text-based Internet indexing and searching facilities. The resulting index with [sic] store the association between the original Web page and the metadata which describes that page's media data content.

*Chatterjee*, 1:28-41. Plainly, this passage teaches that text-based metadata describing multimedia in a web page (e.g., the name of a song or an actor present in a video) may be embedded in that web page. And that ultimately, the text-based metadata may facilitate text-based searching such that the web page is included in keyword based search results, even if the original page did not include the name of the song or actor. As described, once the metadata is included in the web page, a parsing tool (e.g., a web-based crawler) may include the metadata as keywords (along with actual text present) when the page is added to a keyword search index. In such a case, the index provides an index of web pages that include whatever search terms are within the scope of the index. For example, index may include a list of web pages web page includes the name of the song or the actor. That is, what gets indexed is not the metadata parameters describing the multimedia, but the web pages.

In contrast, claim 10 (and 28) require a step of “creating an index for the annotated data object by mapping the identifying parameters to columns in an index table.” There is utterly no support in *Chatterjee* for the conjecture that the search index of keyword search terms disclose would be created “by mapping the identifying parameters to columns in an index.” That is, the extra embedded metadata identifying (e.g., a name or an actor or song title) is not “mapped to columns of an index table.” And in fact doing so simply makes no sense as it would require the keyword search index disclosed in *Chatterjee* to have a column for every conceivable text search term.

The second passage cited by the Examiner does not change this analysis. The passage provides:

The metadata extracted from the content of the media data is appended at 42 to the metadata previously obtained from other sources, including the markup tags which identified the media data, from system directories, and from other sources, such as keyboarded input accepted from a human editor and supplied in response to automatically generated prompts generated during the course of the annotation process.

*Chatterjee*, 6:44-51. Instead, this passage makes the unremarkable observation that metadata describing multimedia content in a web page may be obtained from different sources, e.g., the file itself (a file name, or an ID3 tag in an MP3 file) or a from a person who manually tags the file – a user typing in the name of a song.

Moreover, the Examiner concedes that:

*Chatterjee et al.* does not explicitly teach wherein the mapping functions for each mapping are designed to map a different set of identifying parameters to columns in the index table.

But suggests:

*Chatterjee et al.* does teach mappings depending on media type association (*Chatterjee et al.*, column 1, lines 42-46; column 3, lines 48-50)

It would have been obvious to one of ordinary skill in the art at the time the invention was made to mappings depending on media type association because *Chatterjee et al.* teaches different media types wherein different media-types could contain different amount and type of parameters (*Chatterjee et al.*, column 4, lines 56- 62).

Final Office Action, p. 5. However, the “the media type associations” are not different “mapping functions” each “designed to map a different set of identifying parameters to columns in the index table,” as recited by claims 10 and 28. Instead, the media type associations identify a particular program associated with a file on a Web server. The MIME type tells the server, and the Web browsers of any connected users, what the file type of the binary data is, and which application to used to open the data (e.g., a MIME type association used to identify an application to play an MP3 audio track or a PNG mine type to indicate that binary data is an image). This information may help the system disclosed in *Chatterjee* access metadata embedded in binary data (e.g., to access ID3 information in an MP3 file). Clearly however, the file type associates do not

in any way disclose “mapping functions” used to map “identifying parameters to columns in the index table,” as recited by claims 10 and 28.

Finally, claims 10 and 28 require that “the mapping functions of at least one of the mappings maps more than one identifying parameter to a single column.” The Examiner concedes that the metadata-embedding system disclosed in *Chatterjee* does not disclose this limitation, but turns to *Dobrowski*. Specifically, the Examiner suggests:

Dobrowski et al. does teach wherein the mapping functions of at least one of the mappings maps more than one identifying parameter to a single column (.Dobrowski et al.; figure 4, column 8, lines 44-47).

Final Office Action, p. 5. The brief passage cited by the Examiner provides:

A number of import parameters specifying a type of device in the import file specified by the user are displayed in a first window 112 of the mapping process startup template 110.

*Dobrowski*, 8:44-47. *Dobrowski* is directed a system for managing data related to industrial process systems “like those used in chemical, petroleum or other processes.”

*Dobrowski*, 1:14-17. *Dobrowski* points out that some devices may supply sensor data in a format incompatible with an “Asset Management Solutions (AMS) application sold by Fisher-Rosemont systems.” *Dobrowski*, 1:56-57. For example, by its own terms:

Another problem associated with importing device information into an AMS database is a use of enumerations to define various parameters describing a device. For example, in the AMS a parameter named pressure\_output\_transport\_function, which is used to describe pressure output transport function of certain type of device, may contain only a value of 0 or 1, where 0 represents a linear function and 1 represents a square root function. On the other hand, a generic text file describing the same type of device from a 3<sup>rd</sup> Party may define the same characteristic of the device by a parameter named output\_pressure\_transport\_function, which may contain only a value of L or S, where L represents a linear function and S represents a square root function. When importing data from such a generic text file into the AMS application, it is necessary that all instances of L are converted to 0 and all instances of S are converted to 1.

*Dobrowski*, 2:39-53. The “mapping utility” cited by the Examiner:

allows a mapping of various parameters from various import files contained in the import files database 64 to various parameters used to describe devices in the AMS database 60. The import files contained in

the import files database 64 may be provided by various device manufacturers or other third party applications.

*Dobowski*, 4:59-65. The passage cited by the Examiner points out that devices in an industrial process system may be characterized by a number of parameters. And the particular example in Figure 4 “shows a list of parameters describing Rosemount 1151 Rev. 6 type of devices, such as AC/DC, Deadband Mix, etc., which describe this type of devices in an import file specified by a user.” *Dobowski*, 8:67 – 9:3. At the same time, nothing in these passages describing the parameters from an “import file” discloses a mapping function that “maps more than one identifying parameter to a single column in an index table,” as recited by claims 10 and 28.

Accordingly, for all the foregoing reasons, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

### Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Gero McClellan, attorney of record, at (336) 698-4286, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted, and  
**S-signed pursuant to 37 CFR 1.4,**

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